

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	Chapter 11
FTX TRADING LTD., <i>et al.</i> , ¹	Case No. 22-11068 (JTD)
Debtors.	(Jointly Administered)
	Ref. No. __

**ORDER SUSTAINING DEBTORS' FORTY-SECOND (SUBSTANTIVE)
OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR PARTIALLY
UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the forty-second omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”), for entry of an order (this “Order”) sustaining the Objection and modifying and reducing the Overstated and/or Partially Unliquidated Claims set forth in Schedule 1 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each Overstated and/or Partially Unliquidated Claim set forth in Schedule 1 attached hereto is modified and reduced. The claims listed in the column titled “Modified Claims” identified in Schedule 1 attached hereto shall remain on the claims register, subject to the Debtors’ further objections on any substantive or non-substantive grounds.
3. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors’ right to object on any other grounds that the Debtors discover is preserved.
4. To the extent a response is filed regarding any Overstated and/or Partially Unliquidated Claim, each such Overstated and/or Partially Unliquidated Claim, and the Objection as it pertains to such Overstated and/or Partially Unliquidated Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order will be deemed a separate order with respect to each Overstated and/or Partially Unliquidated Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the

applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

5. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

6. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

7. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

8. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

9. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
United States Bankruptcy Judge

SCHEDULE 1

Overstated and/or Partially Unliquidated Claims

FTX Trading Ltd. 22-11068 (JTD)
Forty-Second Omnibus Claims Objection
Schedule 1 - Modified Claims

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
85559	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			BTC			0.000213446371713
			DOT	10,004.292296599120000		10,004.292296599120000
			ETH			0.000262959756536
			ETH-1230			-0.00000000000113
			ETH-PERP			-0.00000000000113
			ETHW			0.009760688661701
			FTT			28.142297421575602
			SOL	640.012167792498800		640.012167792498800
			SRM			185.721959240000000
			SRM_LOCKED			756.880678160000000
			TOMO			0.000000010000000
			TRX			0.00000002430974
			USD	1,212,349.755680424000000		1,212,349.755680424000000
			USDT	428,314.089413880000000		428,314.089413880000000
			WAVES			0.000000010000000
			WBTC			0.000000020000000
66291*	Name on file	FTX Trading Ltd.			FTX Trading Ltd.	
			1INCH	0.168315850000000		0.168315850000000
			ALEPH	0.426870000000000		0.426870000000000
			BAT	0.416480000000000		0.416480000000000
			BNB	8,487.905793900000000		8,487.905793900000000
			BNT	0.009117000000000		0.009117000000000
			BTC	0.000125439536663		0.000125439536663
			BTC-20210625	-0.000000000000003		-0.000000000000003
			BTC-PERP	-0.000000000000014		-0.000000000000014
			COMP	0.000065273000000		0.000065273000000
			COPE	0.055005000000000		0.055005000000000
			DOGE	0.727825000000000		0.727825000000000
			ETH	31.008091275000000		31.008091275000000
			ETH-20210625	-0.00000000000113		-0.00000000000113
			ETHW	31.0085419000000		31.0085419000000
			FTT	150.024916155531000		150.024916155531000
			NFT (322623088256694790/FTX FOUNDATION GROUP DONATION CERTIFICATE #182)			1.000000000000000
			NFT (372097731343025479/FTX FOUNDATION GROUP DONATION CERTIFICATE #98)			1.000000000000000
			NFT (430146615377697122/FTX FOUNDATION GROUP DONATION CERTIFICATE #44)			1.000000000000000
			NFT (454710056699082911/FTX FOUNDATION GROUP DONATION CERTIFICATE #94)			1.000000000000000
			NFT (482501193729165157/FTX FOUNDATION GROUP DONATION CERTIFICATE #89)			1.000000000000000
			NFT (558532003034819458/FTX FOUNDATION GROUP DONATION CERTIFICATE #84)			1.000000000000000
			NFT (564623864457705320/FTX FOUNDATION GROUP DONATION CERTIFICATE #90)			1.000000000000000
			OXY	0.067460000000000		0.067460000000000
			PERP	0.000000010000000		0.000000010000000
			RAY	0.653665000000000		0.653665000000000
			ROOK	0.000984367500000		0.000984367500000
			RUNE	0.021244000000000		0.021244000000000
			SOL	0.015956639351818		0.015956639351818
			SRM	1,516.391089950000000		1,516.391089950000000
			SRM_LOCKED	11,483.656521040000000		11,483.656521040000000
			USD	14,774,936.870041200000000		14,774,936.870041200000000

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
	USDT			4.057985052641700		4.057985052641700
	YFI					0.00788496368250
	YFI-PERP			0.000000000000003		0.000000000000003

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.

52842 Name on file FTX Trading Ltd. FTX Trading Ltd.

ALCX	0.000000015000000	0.000000015000000
ALCX-PERP	0.000000000000002	0.000000000000002
AVAX	25.040216493468016	25.040216493468016
AXS-PERP	0.000000000000184	0.000000000000184
BADGER	2,208.940000000000000	2,208.940000000000000
BTC		0.587897610389557
BTC-0325	-0.000000000000018	-0.000000000000018
BTC-0624	-0.000000000000003	-0.000000000000003
DAI	1,548,646.026129110500000	1,548,646.026129110500000
ETH		107.722721540162700
ETH-0624	0.000000000000000	0.000000000000000
ETHW	107.139767900251970	107.139767900251970
FTT	419.400990190000000	419.400990190000000
JET	0.000040000000000	0.000040000000000
LUNA2	0.009713352543000	0.009713352543000
LUNA2_LOCKED	0.022664489270000	0.022664489270000
REEF	369,850.000000000000000	369,850.000000000000000
SOL	0.002962754453966	0.002962754453966
SRM	208.579464640000000	208.579464640000000
SRM_LOCKED	1,926.200535360000000	1,926.200535360000000
SUSHI	0.091445000000000	0.091445000000000
USD	6,869,323.029512678000000	6,869,323.029512678000000
USDT	0.006962329033943	0.006962329033943
USTC	1.374972000000000	1.374972000000000
WBTC	0.000017450000000	0.000017450000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat which does not match the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to modify the asserted claim to match their books and records.

55888	Name on file	FTX Trading Ltd.	1INCH	0.000020000000000	FTX Trading Ltd.	0.000020000000000
			AAPL	-0.062651170568838		-0.062651170568838
			AAPL-1230	0.120000000000459		0.120000000000459
			AAVE-PERP	-0.000000000000053		-0.000000000000053
			ADA-BULL	531.6462840000000		531.6462840000000
			ADA-PERP	54,104.000000000000000		54,104.000000000000000
			ALTBULL	256,978.000000000000000		256,978.000000000000000
			ALTBULL	-0.000000000000042		-0.000000000000042
			ALT-PERP	0.000000000000454		0.000000000000454
			AMD-0930	-0.000000000000454		-0.000000000000454
			AMD-1230	-0.000000000000454		-0.000000000000454
			AMZN	0.137272839808966		0.137272839808966
			AMZN-1230	0.180000000000518		0.180000000000518
			APE-PERP	560.800000000087000		560.800000000087000
			APT	-14.610949514935225		-14.610949514935225
			ARKK	-1.475990835947740		-1.475990835947740
			ARKK-1230	-401.5300000000000		-401.5300000000000
			ATLAS	347,698.907850000000000		347,698.907850000000000
			ATLAS-PERP	1,925,010.000000000000000		1,925,010.000000000000000
			ATOM	0.019485000000000		0.019485000000000
			ATOMBULL	680,106.800000000000000		680,106.800000000000000
			ATOM-PERP	-12.990000000016200		-12.990000000016200
			AVAX	-0.225240331821869		-0.225240331821869
			AVAX-PERP	4.399999999970990		4.399999999970990
			AXS	50.110747000000000		50.110747000000000
			AXS-PERP	9.00000000006480		9.00000000006480

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
	BABA			-4.573418972448860		-4.573418972448860
	BABA-0930			0.000000000000213		0.000000000000213
	BABA-1230			2,158.280000000000000		2,158.280000000000000
	BAL			200.382102750000000		200.382102750000000
	BALBULL			276,208.009313990000000		276,208.009313990000000
	BAL-PERP			-200.330000000000000		-200.330000000000000
	BAT			5,078.401610000000000		5,078.401610000000000
	BAT-PERP			-5,078.000000000000000		-5,078.000000000000000
	BCH-PERP			7.462999999999590		7.462999999999590
	BEAR			1,264,145.710000000000000		1,264,145.710000000000000
	BNB			-0.057677214607629		-0.057677214607629
	BNBBULL			92.253635400000000		92.253635400000000
	BNB-PERP			-11.900000000013300		-11.900000000013300
	BRZ			0.482188630163421		0.482188630163421
	BTC			0.009477651498350		0.009477651498350
	BTC-0325			0.000000000000000		0.000000000000000
	BTC-0624			0.000000000000003		0.000000000000003
	BTC-0930			0.000000000000000		0.000000000000000
	BTC-PERP			-0.010000000000722		-0.010000000000722
	BULL			2.024549689000000		2.024549689000000
	CAD			-1,392.896767230215600		-1,392.896767230215600
	CEL			0.072704608531664		0.072704608531664
	CEL-PERP			-0.000000000043655		-0.000000000043655
	CHZ-PERP			7,190.0000000000000		7,190.0000000000000
	CLV-PERP			-0.00000000069860		-0.00000000069860
	COIN			-0.975603038711553		-0.975603038711553
	CRV-PERP			37,866.0000000000000		37,866.0000000000000
	DEFIBEAR			138,666.3550000000000		138,666.3550000000000
	DEFI-PERP			0.000000000000029		0.000000000000029
	DOGE			-401.274502786319900		-401.274502786319900
	DOGEBULL			362.8732400000000		362.8732400000000
	DOGE-PERP			13,576.0000000000000		13,576.0000000000000
	DOT			1,288.477556192995500		1,288.477556192995500
	DOT-0325			0.0000000000301		0.0000000000301
	DOT-PERP			0.000000000020463		0.000000000020463
	DYDX-PERP			33,840.9000000000000		33,840.9000000000000
	ENS-PERP			73.3999999999990		73.3999999999990
	EOS-PERP			-133.89999999761000		-133.89999999761000
	ETCBULL			686.7838000000000		686.7838000000000
	ETC-PERP			100.80000000002000		100.80000000002000
	ETH			25.807589396400440		25.807589396400440
	ETH-0325			-0.000000000000008		-0.000000000000008
	ETH-0624			0.000000000000000		0.000000000000000
	ETH-0930			0.000000000000031		0.000000000000031
	ETH-1230			3.429000000000170		3.429000000000170
	ETHBULL			48.141775600000000		48.141775600000000
	ETH-PERP			2.43999999991240		2.43999999991240
	ETHW			73.908207885301760		73.908207885301760
	EUR			5.164626035093821		5.164626035093821
	EXCH-PERP			0.000000000000003		0.000000000000003
	FB			-0.000258562142453		-0.000258562142453
	FB-0930			-0.000000000000031		-0.000000000000031
	FB-1230			-0.000000000000454		-0.000000000000454
	FIL-PERP			-391.69999999996000		-391.69999999996000
	FLOW-PERP			0.000000000020008		0.000000000020008
	FTM			14,248.834127969147000		14,248.834127969147000
	FTT			149,386.293477550000000		149,386.293477550000000
	FTT-PERP			-18,675.199999999900000		-18,675.199999999900000
	GALA-PERP			34,320.000000000000000		34,320.000000000000000
	GBP			34.577404847045610		34.577404847045610
	GDX-1230			72.57000000000200		72.57000000000200
	GLD			-0.09566511503601		-0.09566511503601
	GLD-0930			-0.00000000000003		-0.00000000000003
	GLD-1230			0.00000000000274		0.00000000000274
	GME-0930			-0.00000000000071		-0.00000000000071
	GME-1230			-0.00000000000113		-0.00000000000113

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
	GMT-PERP			-1,575.0000000000000000		-1,575.0000000000000000
	GODS			0.1951740000000000		0.1951740000000000
	GOOGL			-0.860353833946866		-0.860353833946866
	GOOGL-0930			0.00000000000397		0.00000000000397
	GOOGL-1230			1.68000000000200		1.68000000000200
	GOOGLPRE			-0.000000002033385		-0.000000002033385
	GRT-PERP			14,288.0000000000000000		14,288.0000000000000000
	GST-PERP			58,609.29999999700000		58,609.29999999700000
	HALF			0.0392904000000000		0.0392904000000000
	HEDGE			35.82789715000000		35.82789715000000
	HOOD			17.501674101322376		17.501674101322376
	HT-PERP			0.000000000000724		0.000000000000724
	JPY			391,817.96639450000000		391,817.96639450000000
	KNC-PERP			-0.00000000031832		-0.00000000031832
	LINK			16,137.455319190702000		16,137.455319190702000
	LINKBULL			393,130.700000000000000		393,130.700000000000000
	LINK-PERP			80.200000000089900		80.200000000089900
	LOOKS-PERP			-4,937.000000000000000		-4,937.000000000000000
	LRC-PERP			-6,369.000000000000000		-6,369.000000000000000
	LTC			1,831.797158890008000		1,831.797158890008000
	LTC-PERP			115.109999999999900		115.109999999999900
	LUNA2			185.067514770500000		185.067514770500000
	LUNA2_LOCKED			431.824201131200000		431.824201131200000
	LUNC			1,192.842404668342000		1,192.842404668342000
	LUNC-PERP			-0.00000000000909		-0.00000000000909
	MANA-PERP			-659.000000000000000		-659.000000000000000
	MATIC			23,929.540991172937000		23,929.540991172937000
	MSTR			-0.159911695683863		-0.159911695683863
	MSTR-0930			-0.00000000000113		-0.00000000000113
	MSTR-1230			-0.00000000000142		-0.00000000000142
	MTL-PERP			-460.999999999790000		-460.999999999790000
	NEAR			0.022980000000000		0.022980000000000
	NEAR-PERP			-1,620.900000000000000		-1,620.900000000000000
	NFLX			0.781441054818522		0.781441054818522
	NFLX-0930			-0.000000000000195		-0.000000000000195
	NFLX-1230			-0.21999999999642		-0.21999999999642
	NIO			-0.010747159949382		-0.010747159949382
	NIO-1230			-12,427.350000000000000		-12,427.350000000000000
	NOK			-2.320624552912472		-2.320624552912472
	NOK-0930			-0.000000000000071		-0.000000000000071
	NOK-1230			-0.000000000000198		-0.000000000000198
	NVDA			-0.021071179887643		-0.021071179887643
	NVDA-0930			0.00000000000110		0.00000000000110
	NVDA-1230			0.00000000000188		0.00000000000188
	OKB-PERP			0.00000000000092		0.00000000000092
	ONE-PERP			-261,790.000000000000000		-261,790.000000000000000
	PAXG			0.004093332000000		0.004093332000000
	PAXG-PERP			-0.000000000000014		-0.000000000000014
	POLIS			4,287.471695000000000		4,287.471695000000000
	POLIS-PERP			-4,287.199999999800000		-4,287.199999999800000
	PYPL			0.000161913175348		0.000161913175348
	PYPL-0930			0.00000000000009		0.00000000000009
	PYPL-1230			-0.000000000000198		-0.000000000000198
	PYTH_LOCKED			100,000,000.000000000000000		100,000,000.000000000000000
	RUNE-PERP			13,906.000000000000000		13,906.000000000000000
	SHIB-PERP			-7,900.000000000000000		-7,900.000000000000000
	SLP-PERP			-154,260.000000000000000		-154,260.000000000000000
	SLV			-0.018326280534476		-0.018326280534476
	SLV-0930			0.0000000000000540		0.0000000000000540
	SLV-1230			-2,550.000000000000000		-2,550.000000000000000
	SNX-PERP			-581.100000000010000		-581.100000000010000
	SOL			-18.279416736979474		-18.279416736979474
	SOL-0325			-0.0000000000000085		-0.0000000000000085
	SOL-PERP			0.000000000066847		0.000000000066847
	SPELL			27,370,513.190000000000000		27,370,513.190000000000000
	SPELL-PERP			-7,095,000.000000000000000		-7,095,000.000000000000000

Claim Number	Name	Debtor	Asserted Claims		Modified Claim	
			Tickers	Ticker Quantity	Debtor	Ticker Quantity
	SPY			-0.000430566273444		-0.000430566273444
	SPY-0930			0.0000000000000113		0.0000000000000113
	SPY-1230			-0.000000000000014		-0.000000000000014
	SQ			2.310553636115446		2.310553636115446
	SQ-1230			-0.000000000000049		-0.000000000000049
	SRM			341.597325680000000		341.597325680000000
	SRM_LOCKED			10,527.462674320000000		10,527.462674320000000
	SRM-PERP			4,618.000000000000000		4,618.000000000000000
	STEP-PERP			-129,003.70000001000000		-129,003.70000001000000
	SUSHI			4,804.250475000000000		4,804.250475000000000
	SUSHI-PERP			-1,484.000000000000000		-1,484.000000000000000
	THETA-PERP			-0.00000000024556		-0.00000000024556
	TRX			22,386.501775000000000		22,386.501775000000000
	TRX-PERP			3,061.000000000000000		3,061.000000000000000
	TRY			36,217.821151726500000		36,217.821151726500000
	TRYB			29,283.810854722004000		29,283.810854722004000
	TRYB-PERP			-10,953.000000000000000		-10,953.000000000000000
	TSLA			-0.003230290851143		-0.003230290851143
	TSLA-0930			0.0000000000000113		0.0000000000000113
	TSLA-1230			0.0000000000001534		0.0000000000001534
	TSLAPRE			-0.000000003738941		-0.000000003738941
	TSLAPRE-0930			-0.00000000000321		-0.00000000000321
	TWTR			-0.000000002910394		-0.000000002910394
	TWTR-0930			0.000000000000113		0.000000000000113
	TWTR-1230			-0.000000000001023		-0.000000000001023
	UBER-0930			-0.000000000001136		-0.000000000001136
	UBER-1230			-0.000000000000362		-0.000000000000362
	UNI			0.135479441175967		0.135479441175967
	USD			498,225.715000000000000		468,510.629001738400000
	USDT			126,259.587466141800000		126,259.587466141800000
	USO			0.025136284113048		0.025136284113048
	USO-0930			-0.0000000000000113		-0.0000000000000113
	USO-1230			0.0000000000000795		0.0000000000000795
	USTC			40.232922880561930		40.232922880561930
	WAVES-PERP			-596.000000000000000		-596.000000000000000
	XLM-PERP			-8,698.000000000000000		-8,698.000000000000000
	XRP			39,109.183832642870000		39,109.183832642870000
	XRPBULL			1,004,463.670000000000000		1,004,463.670000000000000
	XRP-PERP			65,351.000000000000000		65,351.000000000000000
	XTZ-PERP			0.008000000003448		0.008000000003448
	YFI-PERP			0.178999999999987		0.178999999999987
	ZEC-PERP			0.000000000000159		0.000000000000159
	ZIL-PERP			19,170.000000000000000		19,170.000000000000000

Reason: The Debtors have conducted a review of the filed proof of claim and any related accompanying materials and their books and records. Based on this review, the Debtor submits that the customer asserted cryptocurrency quantities and fiat overstate the quantities and holdings in such customer's accounts. Accordingly, the Debtors seek to reduce such customer's claim to the modified quantities and amounts.